

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

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|--------------------|---|-----------------------|
| IN RE: | : | |
| Richard G. Novotny | : | Chapter 13 |
| Beverly J. Novotny | : | Case No. 20-10801-ELF |
| Debtor(s) | : | |

**SUPPLEMENTAL APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR SERVICES PERFORMED AFTER CONFIRMATION OF CHAPTER 13 PLAN**

Brad J. Sadek, Esquire applies under § 330 of the Code for an Order directing the Chapter 13 Trustee to pay an award of compensation and reimbursement of actual, necessary expenses for services performed after confirmation of the above-mentioned debtor's chapter 13 plan and represents:

1. The debtor(s) filed a petition under Chapter 13 of the Bankruptcy Code on February 7, 2020
2. The debtor's chapter 13 plan was confirmed by the court on July 21, 2020.
3. This Court has previously approved an Application for Compensation of Counsel Fees in the amount of \$5,300.00.
4. Applicant requests an award of supplemental compensation of \$3,990.50 for 12.1 hours expended in providing the following services:

| Date | Work Completed | By Whom | Hours |
|------------|---|----------|-------|
| 07/31/2020 | Correspondence with Debtors RE: Order Granting Relief of Stay | Attorney | 0.5 |
| 08/03/2020 | Correspondence with Debtors RE: Foreclosure Proceedings | Attorney | 0.3 |
| 08/20/2020 | Correspondence from Debtors requesting Attorney reach out to Mtg. Co. | Attorney | 0.1 |
| 08/21/2020 | Correspondence to PHH Mortgage's attorney RE: Foreclosure Proceedings | Attorney | 0.2 |
| 09/03/2020 | Correspondence with Debtors RE: Foreclosure Proceedings | Attorney | 0.3 |
| 09/04/2020 | Correspondence from Debtors regarding issues with hazard insurance | Attorney | 0.1 |
| 09/08/2020 | Correspondence with Debtors regarding issues with hazard insurance | Attorney | 0.5 |
| 09/30/2020 | Correspondence with Debtors regarding issues with hazard insurance | Attorney | 1.0 |
| 10/09/2020 | Correspondence from Debtors regarding issues surrounding foreclosure | Attorney | 0.1 |
| 10/16/2020 | Correspondence from Debtors regarding issues surrounding foreclosure | Attorney | 0.1 |
| 10/19/2020 | Correspondence to Debtors to request time and patience in resolving the aforementioned foreclosure matter | Attorney | 0.3 |
| 12/09/2020 | Forwarded correspondence from Creditor regarding missed post-petition payments to Debtors | Attorney | 0.2 |
| 12/11/2020 | Emailed Consumer BK regarding inaccurate reporting of Debtors' debts | Attorney | 0.3 |
| 01/04/2021 | Correspondence with Debtors regarding continued issues with foreclosure proceedings | Attorney | 0.3 |
| 01/04/2021 | Correspondence to opposing counsel to determine if foreclosure proceedings began | Attorney | 0.2 |

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|------------|--|-----------|-----|
| 01/04/2021 | Further Correspondence with Debtors regarding continued issues surrounding foreclosure proceedings | Attorney | 0.5 |
| 02/02/2021 | Correspondence with Debtors RE: keeping hazard insurance on property | Attorney | 0.3 |
| 02/26/2021 | Correspondence with Debtors regarding request to purchase a property | Attorney | 0.5 |
| 02/26/2021 | Correspondence to Veteran's United to supply requested documents to support Debtors' Home Purchase | Paralegal | 0.3 |
| 02/26/2021 | Further correspondence with Debtors regarding Veteran's United and obtaining a new loan | Attorney | 0.3 |
| 03/05/2021 | Correspondence with Debtors regarding continued issues with PHH Mortgage | Attorney | 0.5 |
| 03/15/2021 | Correspondence from Debtors regarding scheduled Phone conference with PHH Mortgage and Attorney | Attorney | 0.1 |
| 03/18/2021 | Correspondence to Debtors regarding appointment time with PHH Mortgage | Attorney | 0.1 |
| 03/18/2021 | Telephonic phone conference with PHH Mortgage and Debtors | Attorney | 1.0 |
| 03/23/2021 | Correspondence with Debtors to further explain 03/18/2021 Conference Call | Attorney | 0.5 |
| 04/02/2021 | Correspondence with Debtors regarding Deed in Lieu of Foreclosure | Attorney | 0.5 |
| 04/07/2021 | Further correspondence with Debtors to review Deed in Lieu of Foreclosure | Attorney | 1.0 |
| 04/13/2021 | Correspondence from Debtors regarding new property purchase | Attorney | 0.1 |
| 04/14/2021 | Correspondence with Debtors regarding new property purchase | Attorney | 0.5 |
| 04/19/2021 | Correspondence from Debtors regarding ongoing PHH Mortgage issues | Attorney | 0.1 |
| 04/20/2021 | Correspondence with Debtors regarding ongoing PHH Mortgage issues | Attorney | 1.0 |
| 04/21/2021 | Further correspondence with Debtors regarding ongoing PHH Mortgage issues | Attorney | 0.3 |

Total Hours: 12.1

5. Applicant requests that compensation be awarded at the following hourly rate(s):

Attorney Fees: \$335.00/hr

Paralegal Fees: \$125.00 hr

6. Applicant requests reimbursement of expenses in the amount of \$0.00.

7. Attached as Exhibit B is a copy of the applicants time records setting forth the dates and amount of time expended for the services performed on behalf of the debtor after confirmation of debtor's chapter 13 plan.

8. All services rendered and expenses incurred for which compensation or reimbursement is requested

a. were performed or incurred for or on behalf of the debtor, the services and expenses were actual and necessary, and the compensation requested for those services is reasonable; and

b. are not duplicative of services and expenses for which compensation or reimbursement was previously requested.

9. If this supplemental application is granted, the debtor's confirmed chapter 13 plan (check whichever is applicable)
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☒ is adequately funded.

☐ is not adequately funded.

10. None of the compensation paid to applicant will be shared with any person other than a member or regular associate of applicant's law firm unless 11 U.S.C §504(c) applies.

WHEREFORE, Applicant requests an award of \$ **3,990.50** in compensation and of \$__ in reimbursement of actual, necessary expenses.

Dated: **April 27, 2021**

Signed: **/s/ Brad J. Sadek, Esquire**
Applicant

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